

NO. 13-19-00500-CV

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IN THE COURT OF APPEALS, FILED IN  
THIRTEENTH COURT OF APPEALS, 13th COURT OF APPEALS  
CORPUS CHRISTI, TEXAS CORPUS CHRISTI, TEXAS  
9/16/2020 6:10:57 PM  
KATHY S. MILLS  
Clerk

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TEXAS AUTO SALVAGE, INC. ET AL.,

*Appellants,*

V.

D D RAMIREZ, INC. ET AL.,

*Appellees.*

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*On Appeal from the 37th District Court, Bexar County, Texas  
Honorable Michael Mery, Presiding  
Cause No. 2010-CI-02500*

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**UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME TO  
FILE APPELLEES' BRIEF**

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TO THE HONORABLE FOURTH COURT OF APPEALS:

Appellees respectfully present this unopposed second motion to extend the time in which to file the Appellees' Brief pursuant to Texas Rule of Appellate Procedure 38.6. One previous motion for extension of time to file the Appellees' Brief has been filed. In support of this motion, appellees would show the Court as follows:

## I.

Appellees' response brief is currently due on September 23, 2020. Because of the events and matters described more fully below, appellees request an extension of an additional 30 days in which to file the Appellees' Brief or until October 23, 2020.

## II.

The requested extension is necessary because the following matters have prevented the undersigned from completing the Appellees' Brief and will preclude the undersigned from doing so sooner than September 23, 2020:

1. The undersigned has been assisting in the drafting of the Appellee/Cross-Appellant's Brief in *MedFinManager, LLC v. John Salas*, No. 04-20-00051-CV, in the Fourth Court of Appeals, which involves numerous complicated legal issues and a lengthy appellate record;
2. The undersigned is preparing the appellee's brief in this appeal and the preparation of the brief is unusually complicated in that the appellant's brief in this appeal is very lengthy (14,051 words), the reporter's record is 16 volumes, and appellant has raised 5 issues that must be addressed in the appellee's brief;
3. The undersigned has been required to prepare motions related to a supersedeas bond in *Shannon Medical Center. v. Triad Holdings III, L.L.C.*, No. C150381C; in the 340 District Court, Tom Green County, Texas; and
4. The undersigned has had limited access to childcare given the ongoing COVID-19 pandemic.

For all of the reasons explained above, counsel for appellees cannot complete the Appellees' Brief by its current due date of September 23, 2020, and needs an additional 30 days in which to do so.

### III.

On September 15, 2020, the undersigned conferred with Renee Yanta, appellate counsel for appellants. Ms. Yanta indicated that this motion would not be opposed.

WHEREFORE, PREMISES CONSIDERED, appellees respectfully request that this Court grant this motion for extension of time in which to file the Appellees' Brief, extend the deadline in which to file the brief an additional 30 days up to and including October 23, 2020, and grant such other and further relief to which appellees may be justly and equitably entitled.

Respectfully submitted,

/s/ Samuel V. Houston, III

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## CERTIFICATE OF SERVICE

I certify that a true and correct copy of foregoing motion was served on September 16, 2020, to the following:

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